

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	CIVIL ACTION
EUCLIDES SOTO, LOUIS A. MARTINEZ,)	NO.: 04-10892-JLT
JOSE RAMIREZ, CLEMENTE HERNANDEZ,)	
CESAR PIZARRO, ELISON PENA,)	
JUAN COLON, JOSE ORTIZ,)	
RAFAEL TORRES, ANGEL BAEZ,)	
ANTONIO MARTINEZ, WILFREDO ORTIZ,)	
EULOGIO ORTIZ, MIRRAIN MIRANDA,)	
RAFAEL MORENO, NELSON ACEVEDO,)	
and RAMON RODRIGUEZ,)	
Plaintiffs,)	
)	
v.)	
)	
SHERMAN-FEINBERG CORPORATION,)	
FARNSWORTH FIBRE CORPORATION,)	
UNITED STEELWORKERS OF AMERICA,)	
LOCAL 421-U, AND UNITED STEELWORKERS)	
OF AMERICA,)	
Defendants.)	
_____)	

SUPPLEMENTARY MOTION TO ATTACH ASSETS OF THE UNITED
STEELWORKERS OF AMERICA

Now come the plaintiffs and move to attach the real estate goods and chattels and cash, accounts receivable, and other United States assets of the United Steelworkers of America, most of which are in Las Vegas, Nevada, and Pennsylvania, and the Pension Funds, Health Funds and Welfare Funds to satisfy the judgment for damages and costs, which the plaintiff may recover in the sum of \$13,695,000.00 in wage, discrimination and emotional distress damages, and \$65,000,000.00 punitive damages in regard to the second amended complaint, supported by two affidavits, annexing deposition testimony, and documents relative to the likelihood of success on

the merits, where no insurance is available, and the plaintiffs have established their likely damages.

Respectfully submitted,

Dated: March 8, 2006

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served by electronic transfer on the attorney of record for each party.

Dated: March 8, 2006

/s/ Robert O. Berger
Robert O. Berger (BBO#: 038900)